

Sealed

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas

FILED

July 16, 2020

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA,

§

v.

§

JOSE LUIS DE JONGH-ATENCIO

§

CRIMINAL NO. 4:20-CR-305

§

UNDER SEAL

§

MOTION TO SEAL INDICTMENT

COMES NOW the United States of America, by and through the undersigned attorneys, and moves this Honorable Court to seal the Indictment, this motion, and order, and would state the following:

The Indictment contains information regarding a sensitive investigation regarding corruption and money laundering. Public exposure of this information, prior to the service of the summons, could allow the defendant and others to tamper with witnesses and dissipate assets involved in money laundering.

WHEREFORE, the Government requests that the Indictment and this motion and order be filed under seal, except for a copy to the Investigative Agency and the U.S. Attorney's office for the Southern District of Texas, and that the Indictment be unsealed at the time of the defendant's initial appearance.

Respectfully submitted,

RYAN K. PATRICK
United States Attorney

/s/ Robert S. Johnson
Robert S. Johnson, AUSA
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